

# UNITED STATES DISTRICT COURT

## DISTRICT OF WYOMING

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

OCT 22 2009

Stephan Harris, Clerk  
Casper

UNITED STATES OF AMERICA

v.

SCOTT HOFFMAN

CRIMINAL COMPLAINT

CASE NUMBER: AMJ 195-B

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

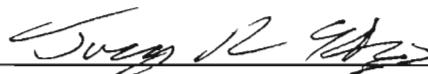
On or about January of 2005, through and including October 17, 2009, in the District of Wyoming and elsewhere, the Defendant herein, **SCOTT HOFFMAN**, together with other persons both known and unknown, did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree to possess with intent to distribute, and to distribute, 50 grams of methamphetamine (actual), a Scheduled II controlled substance.

In violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A).

I further state that I am a Special Agent with the Division of Criminal Investigation and that this complaint is based on the following facts:

**(SEE ATTACHED AFFIDAVIT)**

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant

**TROY HIPSAG**

Sworn to before me and subscribed in my presence,

October 22, 2009

Date

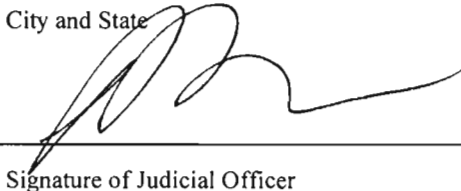
at

Casper, Wyoming

City and State

**R. Michael Shickich**  
**United States Magistrate Judge**

Name & Title of Judicial Officer



Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**  
**DCI AGENT TROY HIPSAG**  
U.S. v. Scott Hoffman

I, Troy Hipsag, am currently assigned to the Wyoming Division of Criminal Investigation, North East Enforcement Team, as a Task Force Officer. I have been employed with the Campbell County Sheriff's Office, in Gillette, Wyoming, since March, 2006. I was employed as a patrol deputy from September 11, 2006, until joining the Task Force on August 24, 2009.

Since at least 2007, Agents have received information that Scott HOFFMAN, a resident of Upton, Wyoming, has been involved in the distribution of methamphetamine and was purported to have a source of supply for the methamphetamine in the Casper, Wyoming area.

On Saturday, October 17, 2009, at approximately 2:22 p.m., Deputy Trevor Budd of the Campbell County Sheriff's Office stopped a maroon, 1980 Cadillac, bearing Wyoming license plate 18-PC-2469. The car was occupied by the driver, Scott HOFFMAN, and a passenger, Jody PEICHURA. Law enforcement officers had previously witnessed HOFFMAN enter the home of a known distributor in Casper, Wyoming, on October 17, 2009.

Corporal Gary Spears of the Campbell County Sheriff's Office arrived shortly after the initial stop, as a backup officer. Corporal Spears conducted an external sniff of the vehicle with his K-9 Mick. K-9 Mick indicated on the drivers side door of the vehicle. Corporal Spears deployed K-9 Mick in the vehicle. As Corporal Spears was deploying K-9 Mick in the vehicle, Deputy Budd told Corporal Spears that Hoffman had confessed to having "meth" in the coat behind the drivers' seat of the vehicle. Corporal Spears moved the coat, which had been behind the drivers' seat, to the front floor board of the vehicle. K-9 Mick indicated on a pocket of the coat. Inside the pocket was a hard pack of ~~Marlboro~~ cigarettes. Inside the hard pack of

~~Marlboro~~ cigarettes was a baggie which HOFFMAN said contained 13 grams of methamphetamine. Also found in the vehicle was a folding scale which resembled a cell phone.

HOFFMAN was arrested for Possession of Methamphetamine with the Intent to Deliver. Deputy Budd handcuffed HOFFMAN behind his back. The handcuffs were checked for fit and double locked. HOFFMAN was transported to the Campbell County Detention Center.

**INTERVIEW WITH SCOTT HOFFMAN:**

On Saturday, October 17, 2009, Special Agents Hipsag and McDonald interviewed Scott HOFFMAN in the large interview room at the Campbell County Sheriff's Office. HOFFMAN was given his Miranda advisement by SA Hipsag, and HOFFMAN agreed to talk with SA Hipsag and SA McDonald. The following information was gained from the interview:

HOFFMAN said he left Upton, Wyoming, at approximately 5:20 a.m. on October 17, 2009. HOFFMAN and Jody PEICHURA drove to Gillette, Wyoming, where they met Ed. Ed gave HOFFMAN \$1400.00 for the purchase of one-half ounce of methamphetamine. HOFFMAN and PEICHURA drove to Casper, Wyoming. HOFFMAN dropped PEICHURA off at a store in Casper, Wyoming, and drove to the home of his source of supply. HOFFMAN had called his source the previous day to arrange the sale of methamphetamine. Once at his source's house, HOFFMAN gave his source two thousand four hundred dollars (\$2400.00) and got twenty four (24) grams of methamphetamine. HOFFMAN went and picked PEICHURA up from the store and they returned from Casper with the intent to sell the methamphetamine.

HOFFMAN said he has been dealing methamphetamine for approximately seven years. HOFFMAN has been getting approximately one ounce of methamphetamine per week from his source in Casper for the past four to five years.

**TEST OF SUSPECTED METHAMPHETAMINE:**

The suspected methamphetamine which was found in the coat pocket of the coat in Hoffman's car weighed approximately 23.7 grams. A field test was conducted with a presumptive positive result for methamphetamine.

Based on the foregoing facts, your affiant believes that violations of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A) have been committed by the defendant, SCOTT HOFFMAN.

  
SA Troy Hipsag, DCI

Subscribed and sworn to before me this 22 day of October, 2009, Casper, Wyoming.

  
UNITED STATES MAGISTRATE JUDGE

**PENALTY SUMMARY**  
**(Complaint)**

**DATE:** October 22, 2009

**DEFENDANT NAME:** **Scott Hoffman**

**VICTIM (Yes or No):** No

**OFFENSE AND PENALTIES:**

**OFFENSE:** **Ct. 1** **21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)**  
(Conspiracy to Possess with Intent to Distribute,  
and to Distribute, Methamphetamine)

**PENALTIES:** NLT 10 YEARS TO NMT LIFE IMPRISONMENT  
NMT \$4,000,000 FINE  
NLT 5 YEARS TO NMT LIFE SUPERVISED RELEASE  
\$100 SPECIAL ASSESSMENT  
CLASS "A" FELONY

**AGENT:** Troy Hipsag, DCI  
**AUSA:** Stuart S. Healy, III

**ESTIMATED TIME OF TRIAL:**

☒ five days or less  
☐ over five days  
☐ other

**INTERPRETER NEEDED:**

☐ Yes  
☒ No

**THE GOVERNMENT:**

☒ will  
☐ will not

☐ The court should not grant bond because  
the Defendant is not bondable because  
there are detainers from other  
jurisdictions

**SEEK DETENTION IN THIS CASE.**